

From: [Robert Neely](#)
To: [Burt Shephard/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#)
Cc: [Nancy Beckvar](#); [Jay Field](#); [Robert Neely](#)
Subject: NOAA comments on PH BERA elements -- fish
Date: 03/23/2010 03:44 PM
Attachments: [robert_neely.vcf](#)

Hey Burt, Eric and Chip,

Attached are comments from NOAA on select sections of the BERA. Nancy Beckvar conducted this review per my request that she focus primarily on the fish elements of the BERA. As you know, Jay Field is working the predictive model (LRM) and aspects of the benthic risk assessment. His comments are not included in this submittal but we will get them to you as soon as we can.

The key thing to highlight in the attached comments relates to errors that can and should be fixed. Both the tissue residue and aqueous DDT TRV concentrations were incorrectly calculated, as described in our detailed comments. NOAA would greatly appreciate corrections to these errors, and that all the calculations that use these numbers also are adjusted accordingly.

If you have specific questions on these comments, please contact Nancy at 206-526-6557. For more general questions and NOAA's review of the BERA, please contact me. I anticipate that we will be submitting additional comments, general and specific.

We really appreciate your flexibility in allowing us to get our comments in to you after the established deadline.

Thanks,

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Robert Neely
Regional Resources Coordinator
NOAA Office of Response and Restoration
(206)526-6617 Office
(206)617-5443 Mobile